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*Counsel for Wells Fargo Bank, N.A., d/b/a Wells
Fargo Home Mortgage, in its capacity as servicer
for HSBC Bank USA, National Association, as
Trustee for Nomura Asset Acceptance
Corporation, Mortgage Pass-Through Certificates,
Series 2005-AR6*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

IN RE:)	
)	
ALICE THOMAS,)	Bankruptcy Case No. 18-12376 KHK
)	
Debtor.)	Chapter 13
)	
ALICE THOMAS,)	
)	
Plaintiff,)	
)	
v.)	Adv. Pro. No. 18-01093 KHK
)	
SAMUEL I. WHITE, PC, et al.,)	
)	
Defendants.)	
)	

MOTION TO DISMISS ADVERSARY PROCEEDING

Wells Fargo Bank, N.A., d/b/a Wells Fargo Home Mortgage (“Wells Fargo”), in its capacity as servicer for HSBC Bank USA, National Association, as Trustee for Nomura Asset Acceptance Corporation, Mortgage Pass-Through Certificates, Series 2005-AR6, by its undersigned counsel and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, made applicable to this adversary proceeding by Rule 7012 of the Federal Rules of Bankruptcy Procedure, hereby moves to dismiss Debtor Alice Thomas’s (“Debtor”) Complaint (Dkt. No. 1)

for failure to state a claim upon which relief can be granted. The grounds for this Motion are set forth in the accompanying Memorandum in Support of Motion to Dismiss Adversary Proceeding. A proposed Order is filed herewith.

Dated: October 9, 2018

Respectfully submitted,

/s/ Jeffrey L. Tarkenton

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 9th day of October, 2018, a copy of the foregoing Motion to Dismiss Adversary Proceeding was served via the Court's CM/ECF system upon all counsel of record and by first class, U.S. mail, postage prepaid, upon the following:

Alice Thomas
6516 River Tweed Lane
Alexandria, VA 22312

/s/ Jeffrey L. Tarkenton
Jeffrey L. Tarkenton